

**AFFIDAVIT IN SUPPORT OF APPLICATIONS
FOR SEARCH WARRANTS AND CRIMINAL COMPLAINTS**

I. PURPOSE OF THE AFFIDAVIT

1. This affidavit is submitted in support of an applications for three (3) search warrants on real properties and six (6) search warrants for vehicles. It is also submitted in support of criminal complaints for the following five (5) individuals:

- a. **German de Jesus VENTURA**, aka el Chino, aka Pancho, aka Chele, aka Mike;
- b. **Kerlin Esau ESQUIVEL-Fuentes**, aka la Flaco;
- c. **Luis Alberto REYES**;
- d. **Isidro JIMENEZ-Sanchez**;
- e. **Wibert Alejandro HERRERA-Aranda**.

II. SEARCH WARRANTS

2. **REAL PROPERTY:** This affidavit is submitted in support of search warrants on the following properties, more particularly described in Attachment A hereto:

- a. **31 B Carver Street, Annapolis, Maryland 21401**;
- b. **1913 Nova Avenue, Capitol Height, Maryland 20743**;
- c. **2936 Powder Mill Road, Hyattsville, Maryland 20783**.

3. **VEHICLES:** This affidavit is submitted in support of search warrants for the following vehicles:

- a. **1995 Green Ford Explorer, Vin# 1FMDU34X7SUA59648**, MD Tag 57157M5, listed to German De Jesus VENTURA of 1913 Nova Ave. Capitol Heights, Prince George County, MD 20743. As of Monday, June 28, 2010 the same vehicle was located at 2936 Powder Mill Rd in Beltsville, MD, with a new tag of 7MD8666, and now listed to Yenis H Ruiz Vasquez of 1913 Nova Ave, Capitol Heights, MD 20743;
- b. **1998 Silver Ford Expedition, Vin# 1FMRU1769WLB80769**, MD Tag 24979CD, listed to Yenis H Ruiz Vasquez of 1913 Nova Ave. Capitol Heights, MD 20743;
- c. **2000 Chevrolet Astro Van, Vin # 1GCDM19W2YB103763**, MD Tag **A216093**, white with blue stripes down the sides. The 2000 Chev Van is listed to VVV Home Construction Inc, which is a business registered through Maryland to German VENTURA;

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d. **1994 Nissan Sentra 4D, Vin # 1N4EB31FXRC773130**, MD Tag 7GCD47, tan in color. The 1994 Nissan was formerly listed to Jose Melvin Bonilla Lago of 318 E Dover St. Easton MD, 21601, and, as of September 10, 2010, the above vehicle switched owners & Tags (**9AA0212**) and is now listed to Jose Antoni Lopez of 8400 Navahoe Dr, Silver Spring, MD 20903;

e. **1993 Honda 4door, Vin# 1HGE8650PL036087**, MD tag **9AA0211**, light blue in color. The 1993 Honda is listed to VVV Construction Inc of 1913 Nova Ave, Capitol Heights, MD 20743;

f. **1998 Toyota Corolla, VIN#1NXBR18E4WZ064494**, MD tag A167229, green in color with an off color white trunk. The 1998 Toyota is listed to Omar Reyes Flores of 1981 Dominoe Road, Annapolis, MD 21401.

The vehicles identified above in subparagraphs a, b, c, and e have all been observed by your Affiant or other law enforcement officers parked at different times in front of 1913 Nova Avenue, as recently as the week of November 8, 2010. The vehicle identified above in subparagraph f was last observed on November 14, 2010, in the parking lot of 31 B Carver, Annapolis. The vehicle identified in subparagraph d was last observed in October 20, 2010, parked on Oaklawn Avenue near Carver Street Annapolis, MD.

III. BACKGROUND

4. Your Affiant, Edward J. Kelly, being duly sworn, states that I am a Special Agent of the United States Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) presently assigned to the Worksite Enforcement, Human Trafficking Group located at the Custom House, Baltimore, Maryland. I have been employed with ICE since March 2003. I was employed as a Special Agent with the Immigration and Naturalization Service from May 2002 to March 2003. I was an Immigration Enforcement Agent with the Immigration and Naturalization Service from February 2001 to May 2002. I was a U.S. Border Patrol Agent with the Immigration and Naturalization Service from July 1997 to February 2001. I have graduated the U.S. Border Patrol Academy at Charleston, South Carolina and the Criminal Investigators Training Program at the Federal Law Enforcement Training Center at Glynco, Georgia.

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5. As a Special Agent with ICE, your Affiant has participated in numerous administrative and criminal investigations of individuals who are in violation of statutes relating to the immigration and human trafficking laws of the United States, including numerous investigations regarding Hispanic brothels and violations of the Mann Act, Title 18, United States Code, Section 2421, *et seq.*

6. Based on my training and experience, I know that owners of Hispanic brothels employ three positions for the brothel to operate successfully; a doorman also known as the caretaker, an advertiser/lookout, and the prostitutes themselves. The doorman answers the door, collects the money, provides the client with a ticket to receive sexual services, keeps track of how many clients each girl services and is the direct liaison with the owner of the brothel. The advertiser/lookout passes out cards to prospective clients, maintains surveillance of the area where the brothel operates to avoid detection by law enforcement and robberies by other criminals and can fill in for the doorman if needed. In most brothels the girls have to stay in the brothel during business hours and are provided supplies and food by the doorman and the advertiser/lookout. The prostitutes work on a weekly schedule, typically arriving late Monday morning to start the week and leaving on Sunday afternoon/evening. The prostitutes are sold condoms in bulk quantity and use paper towels with rubbing alcohol to clean the clients as part of the service. KY Jelly or other lubricants are used and also are purchased in bulk quantities.

7. Owners of Hispanic brothels routinely use aliases or pay individuals to sign the lease agreements for the houses and the vehicles used to service the house to avoid detection and personal liability. The owners use nicknames to avoid detection and liability. The owners will occasionally visit the brothels for various reasons but do not routinely perform any of the

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functions listed above. Money is usually picked up when a large enough amount has accumulated that the owner is concerned about robberies by other criminals. Owners will routinely keep schedules of girls that have made arrangements to work at their brothels, the scheduling can occur weeks before a prostitute comes to work at the brothel. The owners routinely maintain records – also known as tally sheets, contact information for prostitutes and other sex industry owners/workers. The owners are known to use computers to produce the media used to advertise the business. The owners routinely use cell phones and PDA's for the purpose of contacting the brothel, prostitutes and other sex industry owners/workers. These items are maintained by the owner on their person, at the actual residence of the owner or another residence not associated with the brothel but one that the owner frequents, has access to and feels secure at. Some owners will establish front companies that routinely deal in cash transactions in an attempt to legitimize the illegal proceeds.

IV. STATUTORY AUTHORITY

8. The following statutes are relevant to this application:

a. **18 U.S.C. 2421. Transportation generally.** Whoever knowingly transports any individual in interstate or foreign commerce, or in any Territory or Possession of the United States, with intent that such individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title or imprisoned not more than 10 years, or both.

b. **18 U.S.C. 2422. Coercion and Enticement.** (a) Whoever knowingly persuades, induces, entices, or coerces any individual to travel in interstate or foreign commerce, or in any Territory or Possession of the United States, to engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title or imprisoned not more than 20 years, or both.

c. **18 U.S.C. 371. Conspiracy to commit offense or to defraud United States.** If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one

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or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.

V. BASIS FOR PROBABLE CAUSE

9. The information provided in this affidavit is based upon my personal knowledge and observations made during the course of this investigation, information conveyed to me by others, including law enforcement officials, my review of records, documents, and other evidence obtained during this investigation, and information and files within the control of United States Citizenship and Immigration Services (USCIS). All conversations and statements described in this Affidavit are related in substance and in part unless otherwise indicated.

10. This affidavit contains information necessary to support probable cause for this application. Because this Affidavit is being submitted for the limited purpose of establishing probable cause for search warrants on the properties and vehicles listed above, and criminal complaints, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. I have not, however, excluded any information known to me that would defeat a determination of probable cause.

VI. INTRODUCTION

11. Your Affiant submits that this affidavit provides information to support a finding of probable cause to believe that German VENTURA, is the leader of an enterprise engaged in interstate prostitution and enticing or coercing others to engage in interstate prostitution, which operates in the vicinities of Annapolis, Maryland, Easton, Maryland and elsewhere. Kerlin Esau ESQUIVEL-Fuentes, Luis Alberto REYES, Isidro JIMENEZ-Sanchez, and Wibert Alejandro

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HERRERA-Aranda, and others, have all participated in and aided and abetted in the this operation of this enterprise under the auspices of German VENTURA. The properties and vehicles identified above have used or are currently being used to facilitate their criminal activities.

VII. PROBABLE CAUSE

A. 2008 MURDER OF RIVAS-RAMIREZ and RELATED PHONE THREATS

12. On September 13, 2008 at approx 00:37 hours, the Annapolis Police Department received a call for shots fired in the area of Janwal Street and Marda Lane in Annapolis, MD 21403. Officers arrived on scene and located a Hispanic male and a Hispanic female inside of a vehicle suffering from gun shot wounds. The male was identified as Ricardo Humberto RIVAS Ramirez, a/k/a "Victor," and "Pelon." Paramedics from the Annapolis Fire Department pronounced RIVAS Ramirez dead at the scene. An autopsy revealed RIVAS Ramirez was shot and his death was ruled a homicide.

13. The female victim was taken to the hospital; after several weeks she was released and provided law enforcement with information about the incident. She admitted that she was a prostitute and arrived in Maryland by bus on September 12, 2008, having traveled from New York. She said that she was transported by RIVAS-Ramirez to the Annapolis area to service Hispanic males. The female victim had a notebook, inside of which there were phone number's to individuals she identified as "pimps" – the men who organize and direct the business of prostitutes. One of the numbers – 410-963-0903 – was associated with a "Poncho." The female victim positively identified the address of 134 Janwall St., Annapolis, MD 21403, as the home where she provided commercial sexual services to several men the night prior to her being shot.

14. The female victim also provided addition information about the suspect who shot Ricardo RIVAS Ramirez and her. She described the gunman as a Hispanic male, possibly from Honduras, 25-26 years-of-age, a little tall, wearing a baseball hat and black and white stripe shirt. The female victim is not further identified herein for her own safety.

15. According to a neighborhood witness to the incident, a Hispanic male was seen fleeing on foot from the victim's vehicle shortly after shots were fired. The vehicle was processed. for fingerprints, and DNA samples were recovered from the vehicle. Subsequent analysis of some of the DNA provided a positive match to Kerlin Esau ESQUIVEL-Fuentes.

16. Other witnesses in the homicide investigation revealed that RIVAS Ramirez had been transporting and delivering prostitutes to the Annapolis area and in recent weeks prior to his death, he had been threatened by a Hispanic male pimp operating in the Annapolis area and known to the witnesses by several different nicknames, including but not limited to "Poncho," "El Chino," "El-Choco," and "Chelle."

17. Within days of his death, RIVAS Ramirez's girlfriend came to the police station and provided Detective Hartlove with two phone numbers, 410-320-1397 and 240-606-5015. She said that her boyfriend had received threatening phone calls from these phone numbers within the last few weeks, which stemmed from his bringing prostitutes to Annapolis, Maryland. Subscriber information for the numbers showed that 410-320-1397 was listed to Amparo De Jesus Gonzalez of 31 Carver St Apt F, Annapolis MD 21401 and 240-606-5015 was listed to Dulce Maria Benites VENTURA of 31 Carver St Apt F, Annapolis MD 21401.

18. On a later date, a witness known to Annapolis City Police, contacted detectives and provided a written statement claiming that a man with the nickname "Poncho" threatened to

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kill his friend "Victor," who he identified as Ricardo RIVAS. According to this witness, in April 2008, "Poncho" and "La Flaco" – later identified by other witnesses using photo arrays as Kerlin ESQUIVEL Fuentes – pulled up in a White Ford Expedition at the witness's house in Annapolis. "Poncho" showed the witness a 9mm Beretta and told him that he was going to kill "Victor" if he didn't stop bringing the girls to Annapolis, indicating that Annapolis was his territory. The witness also said that "Victor" would tell him about run-ins and threats made by "Poncho" soon after the incident happened. The witness added that two days before "Victor" was killed, "Victor" called him and told him that "Poncho" was following him down Tyler Ave in a white Ford Expedition. According to the witness, RIVAS Ramirez also said that "Poncho" told him that he was involved in the shooting of two Hispanic males on Forest Hills Ave, Annapolis, MD, back in March 2008,, and that "Poncho" told RIVAS Ramirez that he was "next." It has since been confirmed that two Hispanic males were in fact shot on Forest Hills Avenue in March 2008. This witness identified "Poncho" as German VENTURA when shown a photo array of individuals with known identities.

B. ONE OF THE PHONE NUMBERS USED TO THREATEN RIVAS RAMIREZ IS ASSOCIATED WITH ESQUIVEL FUENTES

19. RIVAS' phone records were examined and showed that a phone number associated with "Poncho" had called RIVAS's phone on September 11, 2008 and again after RIVAS' murder on September 13, 2008. A check of Kerlin ESQUIVEL Fuentes's phone records also revealed that a phone number associated with "Poncho" showed up throughout the entire record.

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20. Further investigation of law enforcement data bases relating to phone number 240-606-5015 revealed that Kerlin Esau ESQUIVEL Fuentes had been arrested by the Annapolis Police Department on February 20, 2008, for a vehicle violation and provided this phone number as a contact phone number while being booked. It was determined that ESQUIVEL Fuentes had two open warrants against him.

21. On September 25, 2008, Kerlin ESQUIVEL- Fuentes and Carlos Antonio GUZMAN-Herrera, both of 1009 Madison Ct., Annapolis MD 21403, were arrested on open warrants. ESQUIVEL Fuentes had in his possession a cellular phone with phone number 240-606-5015, the same number used to place threats against RIVAS Ramirez. GUZMAN-Herrera had in his possession a cellular phone with phone number 443-694-4744 and several homemade business cards, identified by your Affiant as cards advertising prostitution services, with the same cellular phone number 443-694-4744 on the cards.

22. ESQUIVEL-Fuentes provided consent to search his home at 1009 Madison Court. Occupants of the house identified the rear upstairs bedroom as ESQUIVAL-Fuentes' room. The room was searched and a large freezer bag full of "Crown" condoms was seized. Consent to search the basement of the house was provided by an occupant. In the basement of the home, law enforcement observed a bed, rubbing alcohol and condoms. This home was identified by trained law enforcement as an operating brothel house.

C. THE SECOND PHONE NUMBER USED TO THREATEN RIVAS RAMIREZ IS ASSOCIATED GERMAN VENTURA

23. During the above referenced search, a cellular phone was located in the living room of 1009 Madison Court, and an occupant provided permission to law enforcement to

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examine the phone. The phone rang several times while officers were examining the phone.

These calls revealed Spanish-speaking males calling to set up appointments for women at 31 F Carver St., Annapolis MD 21401. In the phonebook of this cellular phone, contact numbers for "Pancho" were listed. "Pancho's" numbers were listed as follows: 410-320-1397 and 410-963-0903. A physical address/phonebook was also located in the residence, which also contained contact information for "Pancho." The same numbers above – 410-320-1397 and 410-963-0903 – were listed as "Pancho's" phone numbers. As noted above, the 410-320-1397 phone number is the same number identified by the witness from which threatening calls were made to RIVAS Ramirez prior to his murder.

24. On October 17, 2008, a telephone service provider informed that the cellular number 410-963-0903 was listed to German De Jesus VENTURA of 1913 Nova Ave. Capitol Heights, MD 20743. A Motor Vehicle Administration photograph was obtained for German De Jesus VENTURA, which image was subsequently included in photo arrays shown to witnesses identifying "Poncho," "Chino," and the other aliases or nicknames VENTURA uses.

25. An analysis of RIVAS-Ramirez' phone records showed that the number 410-320-1397 called RIVAS Ramirez's phone on September 11, 2008, two days prior to the murder, and again on September 13, 2008, the same day as the murder. As previously noted, a check of Kerlin ESQUIVEL Fuentes's phone records also revealed "Poncho's" phone number showing up throughout the entire record.

D. BROTHEL OPERATIONS

26. On March 25, 2009, Annapolis Police Officer E. Caraballo received information from a reliable source that a wanted person by the name of Kevin Garcia-Fuentes was staying at

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112 South Ville Ave., Apt. 1, Annapolis, and that the apartment was being used as a brothel house. Police recognized the wanted person as Kerlin ESQUIVEL Fuentes, a/k/a "La Flaco," and knows him to provide law enforcement officers with false identity information, including among others Kerlin Esau ESQUIVEL and Kevin Jose Fuentes.

27. Officers went to 112 South Villa Ave, Apt. 1, and several minutes after announcing the presence of police, Kerlin ESQUIVEL Garcia-Fuentes answered the door. ESQUIVEL was arrested without incident. A sweep of the apartment disclosed two Hispanic females hiding in a dark, back bedroom closet, one of whom an officer immediately recognized from a September 2008 incident at 1009 Madison Ct. as Esmirna Rebeca DUENAS-Franco. The other female was identified as Josefa REYES Rojas.

28. Officers saw paraphernalia and other items, including KY liquid, condoms, rubbing alcohol, water bottles, baby-wipes, towels and hand creams, in the bedrooms, indicating the residence was a brothel house. The rooms were furnished with twin beds.

29. Both women agreed to be interviewed and consented to a search of their personal effects. The women admitted they were prostitutes and that they were there of their own free will. They claimed to receive half of the money paid by the men receiving commercial sex, the fee for which was \$30.00 for 15 minutes. They said that "Kerlin" or "Kevin" was the guy in charge of the home at that time.

30. A search incident to the arrest of ESQUIVEL revealed a total of \$696.00 on his person, a Sprint Blackberry phone in the residence, a search of which ESQUIVEL consented to, and a wallet with miscellaneous papers, one of which had the telephone number 410-963-0903, written on it, which number your Affiant knows to be associated with VENTURA.

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31. On September 1, 2009, Annapolis Police officers discovered prostitution activity at 112 South Villa Ave Apt 1., Annapolis, and 31 Carver St., Apt F, Annapolis, and arrested the occupants of the apartments. All the arrested persons had cell phones and in each of their cell phones they had the number 410-963-0903.

32. One of the prostitutes who was arrested and released was provided temporary lodging by another family residing at the South Villa Avenue location. She used the family's cell phone to call for a ride and a short time after she was picked up by an unknown person, the family received a death threat from a Hispanic sounding male calling from phone number 410-963-0903, the number listed to VENTURA. Several days later, gasoline was poured in the hallway of this family's building and a window was broken in their vehicle. When a male family member contacted 410-963-0903, the call was answered by a Hispanic male, who asked if the caller wanted a girl.

33. On September 24, 2009, Annapolis Police Officers arrested VENTURA on a warrant from the District of Columbia in the vicinity of 809 Chesapeake Ave. Annapolis. After VENTURA's arrest, officers canvassed the area and located two vehicles associated with VENTURA. One vehicle was in front of 809 Chesapeake Ave and a white Chevrolet Astro Van was 3 houses away. The van had MD tag 86V075, which was listed to VVV Construction at 1913 Nova Ave. Capitol Heights MD 20743, the same address as VENTURA's home of record.

34. A search of VENTURA's personal effects disclosed \$859.00 in folded currency of different denominations. Further examination of VENTURA's wallet revealed prostitution tally sheets, which annotated how many customers each of the prostitutes had serviced on each day of the week. On one of the tally sheets it had "Carver" and "Southville" written on it. The wallet

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also contained VENTURA's Maryland driver's license. A Mexican license was located, which contained German VENTURA's picture on the license with the name of Bartolo Simon Contreras Cruz.

35. VENTURA was interviewed and advised he lives at 1913 Nova Ave, Capital Heights, MD 20743. When asked about his phone number he stated he did not have a phone, although two cell phones were recovered on his person. When asked about the phones he had in his possession, VENTURA said he did not know the numbers; he stated he found the Blackberry phone at the Annapolis Mall that day and the other phone belonged to a taxi guy and he was borrowing the phone, but could not provide any additional information.

36. A search and seizure warrant was issued for the two cellular phones taken from VENTURA. Examination revealed the number assigned to the LG phone taken from him was 410-963-0903; and the Blackberry phone was assigned number 347-423-7742. A review of VENTURA's records back from Chevy Chase Bank, showed his work phone number as 410-320-1397. Maryland Income Tax forms for 2007 and 2008 also showed VENTURA's daytime phone numbers as 410-320-1397, which, as noted above, was the number associated with "Poncho" and numerous threatening phone calls.

37. On September 24, 2009, officers went back out to 31 F Carver to look for a wanted person. The officers detectives discovered the apartment was operating as a house of prostitution. Three of the occupants, Carlos ASCENCIO, Helen MELENDEZ-Carbaja, and Margarita LAONA-Santiago, were placed under arrest and charged with prostitution violations. Later, it was revealed that ASCENCIO was a doorman at the brothel and MELENDEZ and LAONA were prostitutes at the brothel. All of them positively identified German VENTURA as

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the owner/operator of the brothel. ASCENCIO further stated that VENTURA had multiple houses and other employees that would transport the prostitutes to the houses.

38. Through a subpoena Annapolis City Police Detective Hartlove obtained one year's phone records for number 410-963-0903, which revealed approximately 47,000 incoming and outgoing phone calls.

39. On February 17, 2010, Annapolis Police Department received a 911 call for a report of possible robbery. An unknown Hispanic male called 911 from phone number 301-418-3124. Although this number was listed to Oscar Delahoya, 4401 Southern Ave, Capitol Heights, MD 20743, your Affiant knows the number to routinely to be used by VENTURA. This number has been associated with other calls to the Annapolis Police Department, in which putatively false reports were made and threatening calls to a cooperating witness. VENTURA has also been seen on the phone when a call was made from a cooperating witness to this number. Furthermore, this number was discovered in a prostitute's phone associated with VENTURA and found in association with a brothel in Prince Georges County, Maryland.

40. The 911 caller said that he was on the phone with his brother and he heard his brother being robbed. The caller said that his brother's phone was taken, he could hear them being told to lay on the floor and he believed their money was taken. The only location the caller could give for the robbery was Forest Hills, building 5, door 3. The caller would not give his name or his brother's. He spoke English fairly well – as does VENTURA – and said he had never been to the location.

41. Officers started checking the area of Forest Hills Avenue and Bricin Street, Forest Hills Apartments. Officer Gilbert observed three Hispanic males walking near Janwall Street,

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when they observed Officer Gilbert's marked police car they started running on foot towards

Crows Nest Court. Officers were already on Crows Nest Court and stopped the three subjects running from Officer Gilbert. The three subjects were later identified. The officers asked the subjects why they were running and one said "robando", which means robbery in Spanish. Officers thought the subjects might be the victims of a robbery. The subjects were speaking Spanish in a very quick manner and none of the officers on scene were proficient in Spanish. Officers were able to understand one of the subjects say something about a black guy with a gun. At that time the three subjects were to be transported to APD Headquarters for further questioning in reference to them being victims of a robbery. Before the subjects got into the police cars, officers frisked the subjects and discovered multiple cell phones and wallets on their persons. Officers were then suspicious that the subjects were the suspects in a robbery rather than the victims.

42. Officers located 5 Melrob Court, Apartment 3 as a possible match to the location where the initial robbery was reported to have taken place. 5 Melrob Court is located off of Bricin Street, which is off of Forest Hills Avenue, in the Forest Hills Apartment complex. When officers made contact with the subjects inside the apartment they confirmed that a robbery had taken place. Officers were immediately suspicious that the apartment was being used as a brothel. They found a TV, couch, 2 beds in the only bedroom, and an additional bed located in a walk-in closet in the bedroom. They also discovered a ledger and business cards with phone numbers similar to the ones previously seen for prostitution. The ledger was in an open spiral notebook with the top page showing a list of two names with hash marks next to the names and the names were "Morena" and "Colombian". One of the female occupants had a dark

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complexion and Morena is a Spanish word used to describe Latinas who are dark/tanned. The other female occupant was from Colombia. This is a common way for the operators of a house of prostitution to keep track of money due to the prostitutes and/or money owed from prostitutes for supplies used. None of the people lived in the apartment. One of the victims said that he believed that the suspects robbed the place because it was a house of prostitution. One of the neighbors stated there was heavy foot traffic into the apartment.

43. The occupants of 5 Melrob Ct. advised that three Hispanic males, with their faces covered, had kicked in the front door and displayed a pistol, machete, and knife and ordered them to the floor and took various items from them. The suspects then fled the scene. The description given of the suspects matched the three subjects stopped on Crows Nest Court. Some of the items taken during the robbery were recovered along the path the suspects fled from Officer Gilbert, while other items allegedly taken during the robbery were recovered from the three suspects. The three subjects at the Annapolis Police Department Headquarters were placed under arrest.

44. A search of 5 Melrob Court, Apt. 3, pursuant to a warrant, revealed numerous items – in addition to the style of furnishing and decorations – that indicated the residence was used as a brothel, including the following: on top of a small chest of drawers was a small shrine to Santisima Muerte or Saint Death, which is a Mexican “saint” to whom criminals are known to pray; in the corner of the living room a glass held what looked to be egg yolks, which the Annapolis Hispanic Liaison said was folk medicine to prevent the girls from becoming pregnant; spiral bound notebooks appeared to have been used as ledgers. listing days, names and hashmarks possibly indicating the number of men serviced by the women; a hole punch, which is

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known to be used by houses of prostitution to punch paper to show a customer has paid for sex; numerous handmade business cards on bright green paper, with lips and a heart stamped on them, as well as two phone numbers, 443-871-8648 and 410-212-5777, both of which were associated with phones recovered from this location; a customizable stamp used to make the cards, which brothels use to advertise and attract business; wintergreen rubbing alcohol; and a small bottle of Stud 100, a liquid lidocaine sprayed on the penis to desensitize it; numerous used condoms and wrappers as well as many unopened packages of condoms; a double bed, mattress and box spring located directly on the floor and a single bed with evidence that they had at one time been temporarily partitioned; KY warming jelly; rubbing alcohol; pieces of paper that matched the paper used to make the handmade business cards; rolls of paper towels; and, numerous playing cards as well as white and red glass pebbles that appear to have been used as "chits" to ensure customers paid and received sexual services and the prostitutes received their money.

45. During an interview on February 18, 2010, one of the robbery suspects, Maximiliano ZELAYA-Rapalo, stated that he had information pertaining to a homicide in Annapolis, MD. ZELAYA said that he had worked for a prostitution business at 5 Melrob Court in Annapolis, for about three weeks and had not been paid for his employment, which was why he robbed the place. ZELAYA said he was working for a man named "Chalo," who he described as a Hispanic male, approximately 5'8", with light brown skin, short black hair and about 30 years old. ZELAYA described "Chalo" as having "Chinese Eyes." He said "Chalo" drives two different vehicles, a Green Ford Expedition and a white van (both with Maryland tags). ZELAYA denied knowing where "Chalo" lives although he said "Chalo" spent several nights

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during the week staying at 5 Melrob Court. ZELAYA described "Chalo" as the self proclaimed boss of Annapolis prostitution.

46. ZELAYA said there is another man that has prostitution houses in Annapolis called "The Dominican". The Dominican is the only direct competition and only threat to "Chalo's" business. ZELAYA said "Chalo" frequently talked of killing the Dominican and killing in general came up. ZELAYA often heard "Chalo" talking on the phone. "Chalo" would say "I will kill anyone that gets in my way." ZELAYA said at one point while working for "Chalo" he overheard "Chalo" talking to "The Dominican" on the phone. He told him to get out of town or he would call the police. "Chalo" said he was going to kill the Dominican when he sees him. ZELAYA said he overheard "The Dominican" and "Chalo" talking on the speaker phone. "The Dominican" said to "Chalo," "remember when you killed Palone?" ZELAYA said "Chalo" accepted that he had killed "el Palone." ZELAYA said "Chalo" announced to the workers in the house that he needs someone to kill the Dominican. ZELAYA was asked by "Chalo" if he wanted the job of killing the Dominican. ZELAYA said "Chalo" comes to the apartment about twice a week to pick up the money. ZELAYA positively identified VENTURA's MVA photograph from an array as "Chalo," the head of the prostitution business in the Annapolis area.

47. On March 13, 2010, Annapolis police received a call from number 301-418-3124, reporting that a woman was forcibly put in a gray Mazda at Forest Dr and Hicks Ave and was screaming for help. The vehicle was located and the driver was arrested. The female passenger was identified and transported to the station for further questioning. The driver was believed to be the "Dominican" guy that officers were looking for, relating back to a homicide case and a

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murder for hire case involving suspect, German VENTURA. During a search of the personal effects of the driver and passenger, police discovered prostitution business cards associated with the driver's cellular phone and prostitution tally sheets in female passenger's purse. The Hispanic female passenger admitted that she just recently started prostituting. She admitted that she was picked up by "Negro," the driver/Dominican Guy, around 4 or 5 p.m. and driven to Annapolis for prostitution. She went to seven or eight homes and serviced different guys that "Negro" drove her too. She advised that at the last house, "Negro" parked where she could not see the home and he went to knock on the door while she stayed in the car. "Negro" returned to the car and then the police stopped him. She admitted that she worked for a different pimp less than a month before in Annapolis, and that this pimp had called her on her phone and threatened her and her kids. She identified this person "Mike" and she described him as chubby built, round face, brown eyes and kind-of "Chinese eyes". She advises that another girl got her in touch with "Mike". She stated that less than a month before (around the snow storm time), "Mike" picked her up at her home in a white van with blue stripes down the side and drove her across the Chesapeake Bay Bridge and two other bridges and set her up in a trailer to service guys. She believes that "Mike" has a problem with "Negro." The female Hispanic passenger advised she has two cell numbers for "Mike"— 301-418-3124 (the same number from which the 911 call was made), and 410-212-4700. She also said he goes by the name of "Chino."

48. The Hispanic female said that about a month or less before "Mike" saw her working for "Negro" and "Mike" called her phone and stated, "do you love your kids?" A week or so after the phone call she had two unknown men kicking and beating on her door. She advised she did not answer the door as she did not recognize them. The Hispanic female was

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asked if she was allowed to leave the apartment when she was prostituting for "Mike" whenever she wanted to. She stated, "the guys aren't going to let me walk away." She was shown a photograph lineup and immediately and positively identified photograph – German VENTURA – as the person who she knows as "Mike" and threatened her and her kids.

49. Early on March 14, 2010, officers spoke with the driver, the "Dominican Guy." Officers advised him they thought his life was in danger. He admitted to them that he was a pimp who drove the female passenger to Annapolis for prostitution. He stated that about August 2009, he started getting into the prostitution business and he brought prostitutes to Annapolis and delivered them to homes. He then started receiving calls on his cellular phone from a person known to him as "Chino." "Chino" began threatening him by stating he was going to kill him if he continues to bring the prostitutes to Annapolis. "Chino" told him that Annapolis was his area. "Chino" also mentioned to him about killing "El Palone" or "Victor." The driver advised that "Chino" called him yesterday at about 2pm or 3pm and stated, "[y]ou're going down today." The driver advised that word was on the street was that "Chino" was going call him to lure him to a certain house and "shoot him in the head." The driver advised that he knows that "Chino" drives a white Chevrolet Astro van with blue stripes and also a gold minivan. The driver advised he would be able to identify the person who has been threatening him, and positively identified German VENTURA in a photo array as the person who he knows as "Chino" and has been calling his cellular phone and threatening his life. On March 15, 2010, "Chino" contacted the driver/Dominican Guy from phone number 301-418-3124, again the same number from which the 911 call came.

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50. Beginning in March 2010 until the present, Annapolis Police Department Detectives along with Agents from U.S. Immigration and Customs Enforcement, with assistance of Easton Police Department, Washington Metropolitan Police Department, Delaware State Police and Virginia State Police, have conducted surveillance on German VENTURA on various days of the week and weekends. VENTURA has been seen operating several different vehicles, which are described above and for which search authorization is requested. Officers have used electronic surveillance in order to track German VENTURA, his vehicles and his associates and have learned that German VENTURA along with his associates have delivered from locations in Virginia, the District of Columbia and Maryland, Hispanic females to 31 B Carver St, Annapolis, MD 21401, 704 Great Bay Ave. Annapolis, MD 21401, 67 Decatur St, Portsmouth, VA 23702, and as of July 7, 2010 to 318 E. Dover St, Easton MD 21601. Over a thousand photographs have been taken of German VENTURA and his associates transporting and dropping off/picking up Hispanic females in the area of Riverdale MD, Washington DC, Easton MD, Annapolis, MD, and Portsmouth, VA.

51. On April 3, 2010, Detective Jose Chinchilla, Prince Georges County Police Department, notified Detective Hartlove that on April 1, 2010, his agency arrested two brothers involved in a brothel house in Oxon Hill, Maryland. While there, one of the brother's cell phone received a call from 301-418-3124, which Detective Chinchilla answered. Detective Chinchilla speaks fluent Spanish and spoke with the caller, who stated in Spanish that this was "Chino from Annapolis," and the caller went on to state that he will bring it on, one on one, gun on gun, and that he wasn't scared and that he's been shot before. The caller threatened the person he called not knowing he was speaking with Detective Chinchilla.

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52. On Monday, April 5, 2010, Detective Hartlove observed German VENTURA arrive in the vicinity of 33 Carver St. and Hicks Ave. driving a Green Ford Explorer, with MD tag 57157M5. Two Hispanic females were in the Explorer. As VENTURA drove around the corner Detective Hartlove observed another Hispanic male with a blue baseball hat greet VENTURA, and grab two duffle bags and walked towards 31 Carver St. The two Hispanic females got out of the Explorer and followed the man with the duffle bags. Shortly thereafter, another Hispanic male in a red shirt entered VENTURA's vehicle. They were followed to the local Shoppers Food Warehouse, where VENTURA was seen purchasing condoms and paper towels.

53. In April 2010 a reliable witness and citizen of the community reported to the Annapolis Police Department Hispanic Liaison Office that currently the prostitution brothel home is up and running at 31 B Carver St. Annapolis, MD 21401. This was the first indication that the prostitution operation had moved to 31 B Carver Street. As of September 6, 2010 the same witness reported to Hispanic Liaison Officer Joe Hudson that the brothel house at 31 B Carver St, Annapolis, MD 21401 is still running. On April 19, 2010, Detective Hartlove again saw VENTURA operating the green Ford Explorer MD, arrive at Oaklawn Ave and Carver St. One Hispanic female and one Hispanic male, later identified as REYES, got out of the Explorer. REYES took the female's bag and both walked on foot towards 31 Carver St., while VENTURA drove away.

54. Witnesses have said that VENTURA has transported prostitutes in a white van with blue stripes down the side. A van matching this description, with damage to the front, driver's side, has been observed sitting in front of VENTURA's home of record at 1913 Nova

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Ave. Capitol Heights MD 20743. The van's tag is MD A205926, and is listed as a 2000 Chev Van, Vin # 1GCDM19W2YB103763, registered to VVV Home Construction Inc, which is a business registered through MD to German VENTURA. The Annapolis Police Department tag reader recorded this van being driven on Hilltop Ln near Young's Farm Rd. Annapolis, MD 21403, on January 29, 2010.

55. VENTURA's van is insured with Maryland Automobile Insurance Fund. A representative of MAIF reported that German VENTURA spoke with a representative of their company about an accident that occurred on February 17, 2010. On April 7, 2010, a MAIF representative called 410-418-3124, and spoke with operator and owner, German VENTURA, to obtain information about the accident. MAIF records reflect that a Kerlin Esquivel was operating the same van on March 6, 2009, at which time it had MD tag 86V075, when he was involved in an accident at 3312 Hollins Ferry Rd, Baltimore, MD. At that time, a MAIF representative spoke with owner, German VENTURA by calling telephone number 410-963-0903.

56. On May 2, 2010, Detective Hartlove observed VENTURA and two Hispanic males, and one Hispanic female, in and out of a 1998 Silver Ford Expedition, Vin# 1FMRU1769WLB80769, MD Tag 24979CD, which vehicle is listed to Yenis H Ruiz Vasquez of 1913 Nova Ave. Capitol Heights, MD 20743.

57. On May 8, 2010, while conducting surveillance at Dover St and S. Locust Ave, Easton Maryland 21601, Detective Hartlove observed the same above-described 2000 Chev Astro van with the blue stripes, bearing a new orange agricultural tag A216093. A check of the tag revealed that the vehicle is still the same VIN number and listed to VVV Construction, VENTURA's business. The vehicle was being operated by VENTURA. Detective Hartlove

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observed mattresses on top of the van and VENTURA delivering a small amount of furniture to 318 E. Dover St. Easton MD 21601, which is a top floor apartment above "Angelica's Latin Market Carniceria" at 320 E. Dover St, Easton MD 21601. While watching the address for about four hours, Detective Hartlove saw one Hispanic female enter the apartment door. Several Hispanic males came and went from the apartment door. One Hispanic male in a white and baby blue horizontal stripe shirt appeared to be the look out and the doormen. Detective Hartlove observed this Hispanic male passing out a business card to another Hispanic male who was walking with another Hispanic male. After a brief conversation both Hispanic males turned around and went inside the apartment with the first Hispanic male. About five minutes later the Hispanic men came out of the apartment door laughing, holding the business card in hand. Based upon his education, training, and experience Detective Hartlove believed this activity to be setting up a brothel house.

58. On May 14, 2010, your Affiant, Detective M. Orellana, Easton Maryland Police Department, and Detective Hartlove were in the vicinity of 318 E. Dover St, Easton MD 21601, when they observed a Hispanic male exit a white van and hurry over to the doorway of 318 E. Dover St. Another Hispanic male was standing next to the door and appeared to open the door with a key and allowed the Hispanic male inside. This activity is consistent with the operations at a brothel house.

59. On May 20, 2010, Detective M. Orellana, reported that one of his cooperating informants (CI) had obtained a prostitution business card from Hispanic male. Detective Orellana showed the CI a photograph of German VENTURA. The CI identified the person in the photograph as the man who handed him the prostitution business card and told him about the

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girls at 318 E. Dover St. The CI said this same man tried to hand him another business card several days later. A number on the business card read 240-604-4630.

60. The phone numbers to the brothels at 318 E. Dover St (240-604-4630) and 31B Carver St (302-250-9346) were turned over to your Affiant. On May 7, 2010, your Affiant had a CI make a one party consent recorded phone call to the Annapolis brothel at 31B Carver St, dialing number 302-250-9346. A Hispanic male answered the phone and confirmed that they had girls available.

61. On May 21, 2010, your Affiant, and Annapolis Police Detectives A. Miguez and J. Hartlove interviewed a cooperating witness at the Anne Arundel County Sheriff's Office, who provided detailed information and positively identified German VENTURA, through a photographic lineup, as the person operating and in charge of the Human Trafficking Prostitution Business in Annapolis and other places.

62. On May 24, 2010, the CI made a one party consensually recorded phone call to the Annapolis brothel at 31 B Carver St, dialing number 302-250-9346. A Hispanic male answered the phone and confirmed that girls were available and that they (girls) were from El Salvador and Mexico.

63. On May 27, 2010, your Affiant had the CI call and make a one party consent recorded phone call to the Easton, MD brothel, calling the above-referenced number 240-604-4630. A Hispanic male answered the phone and confirmed that girls were available and advised the CI to come on in.

64. On June 7, 2010, Detective Hartlove observed two vehicles leave from 318 E Dover St Easton MD. VENTURA was operating a tan Toyota vehicle MD tags 3FTS85 and the

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other vehicle, a Nissan Sentra MD tags 3GAP66 was operated by a Hispanic male. VENTURA had a Hispanic female passenger as well as three (3) Hispanic males. One of VENTURA's passengers was identified as Luis REYES. The Hispanic female exited from 318 E Dover St. Easton MD.

65. On June 11, 2010, Detective Hartlove met with a cooperating witness at the Anne Arundel County Sheriff's Office, who provided detailed information and positively identified German VENTURA, from a photographic lineup, as the person who picked her up in Washington, D.C., in a white van with blue stripes back around September 2009. VENTURA took her to 31 F Carver St., where she was introduced to the doorman/houseman known only to her as "Camillio" [Spanish term meaning "Fang."] The witness described "Camillio" as a man from El Salvador, short in height, 26-28 years-of-age, fat but did not have a belly and missing his front top teeth. The cooperating witness engaged in prostitution at 31F Carver Street.

66. Later on June 11, 2010, Detective Hartlove saw the Nissan Sentra with new MD tags 7GCD47, being driven by VENTURA in the 2000 block of West St, Annapolis, MD.

67. On June 14, 2010, Detective Hartlove surveilled the tan Nissan Sentra, MD tag 7GCD47. The car left 318 E. Dover St, Easton MD and headed westbound on Route 50. As the vehicle turned onto Carver St, Annapolis, MD, Detective Hartlove observed the vehicle was occupied by five Hispanics, including a male driver, male front seat passenger, male rear right passenger, a female middle rear passenger, and a female rear left passenger. As they turned onto Carver St an Anne Arundel County Sheriff Deputy was parked on the corner of Carver St and Oaklawn Ave. The vehicle then made its way down Carver St and Holeclaw St and turned around. As the Sheriff Deputy was leaving the area, the Sentra pulled across the street and two

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of the Hispanic females got out of the vehicle, and one of the men helped carry their bags as they walked to 31 Carver St. A short time later, the driver and a Hispanic female drove to the area of the Jennifer Shop located at Forest Dr and Old Solomons Is Rd. They went inside a store for a short period of time. The tan Nissan Sentra then drove eastbound on Route 50 and the visual surveillance ended. Electronic surveillance revealed the tan Nissan Sentra proceeded northbound on Route 301 to Middletown, Delaware and then down Route 13 to Norfolk, Virginia area, arriving in that area shortly after midnight. Your Affiant knows this activity to be consistent with the transfer of prostitutes from brothel to brothel.

68. On June 21, 2010, Detective Hartlove again surveilled the tan Nissan Sentra and White Chev Astro van with blue stripes. At about 10:30 a.m., the tan Nissan Sentra left 318 Dover St Easton MD area and headed westbound on Route 50 and stopped at 31 Carver St., Annapolis, where another Hispanic male, later identified as Luis REYES, got in the car. The Sentra then drove to Hyattsville area and parked at a McDonald's at Riverdale Rd, Riverdale MD. Detective Hartlove saw there were then two Hispanic females in the rear of the Sentra. At 1:18 p.m., Detective Hartlove saw VENTURA pull up in a white Chev Astro van with blue stripes. A Hispanic female was in the front seat. VENTURA pulled up next to the Sentra and all the occupants got out of the vehicles. A total of four females exchanged seats in the opposite cars. After the exchange, Detective Hartlove followed the Sentra back to Annapolis area, where it stopped at a CVS pharmacy at Riva Rd and Harry S Truman Pkway, Annapolis, MD. The Sentra then drove to 31 Carver St, where the two Hispanic females got out of the vehicle along with the two Hispanic males. A short time later, the driver of the Sentra drove to the WaWa on Route 50, Annapolis, MD, and waited for about an hour. Detective Hartlove then observed

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German VENTURA in a white Chev Astro van with blue stripes, arrive and depart from the WaWa Store, with the tan Nissan Sentra following him. Both vehicles proceeded westbound on Route 50 to Route 495. The vehicles proceeded towards 2936 Powder Mill Rd Hyattsville, MD, the basement apartment of which was occupied by VENTURA's girlfriend, Esmirna Rebeca DUENAS-Franco, and an address VENTURA was known to frequent, when Detective Hartlove then observed both vehicles driving in the opposite direction towards him. The vehicles drove into the Washington DC area and split up. Detective Hartlove then picked up the tan Nissan Sentra near the Washington, D.C./Virginia line. Detective Hartlove observed a Hispanic male driver and a Hispanic female passenger. The Nissan Sentra vehicle proceeded down Route 95 to Norfolk Virginia area. Your Affiant knows this activity to be consistent with the transfer of prostitutes from brothel to brothel.

69. On June 26, 2010, Detective Hartlove came in contact with a Hispanic male, who is known to this detective. While investigating an unrelated crime, the Hispanic male allowed Detective Hartlove to examine his wallet, inside of which was a business card with a picture of a female that said something about "washing cars;" the number on the business card was 302-250-9346. Detective Hartlove recognized this card as an advertisement for prostitution and the number as the phone for the brothel at 31B Carver St. Annapolis, MD 21401.

70. On June 28, 2010, Detective Hartlove observed from electronic surveillance the tan Nissan Sentra traveling up Route 13 toward the Salisbury, Maryland area and on toward Easton, MD. After stopping for a while in the vicinity of 318 Dover St, Detective Hartlove noted the vehicle was heading toward Annapolis, MD. Detective Hartlove was in a covert location near 31 Carver St and observed the Sentra vehicle pull up to that location at 4:40 p.m.. At 6:59

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p.m., Detective Hartlove saw the Sentra pull out of the area with another Hispanic male driver. At 8:10 p.m., the Nissan Sentra was stopped for a repair order violation by Police Officer Mann, and the driver was identified as Luis Alberto REYES. The driver had no Maryland driver's license and was transported to the station for processing and to be photographed. During the booking process, officers noticed that REYES had no front teeth and just his fang (canine) teeth when his mouth was exposed. A search of REYES' property revealed two picture identification cards. One was an El Salvador card with the name of Jose Antoio REYES Maradiago and the other was a Mexican license with the name of Luis Alberto REYES. There was also a Target store receipt dated June 28, 2010, at 7:22 p.m., for "bounty" towels, 2 packs of "lifestyles" condoms, and KY Jelly 4oz. In his possession was a total of \$723.76 and a container of "STUD-100 male genital desensitizer. REYES also had two cellular phones, a Motorola i335 phone, which contained phone number 302-250-9346 and a Kyocera virgin mobile phone, which was phone number 410-212-6451. Detective Hartlove recognized the 302-250-9346 number to be the cellular phone for the brothel home at 31 B Carver St. Annapolis, MD 21401.

71. On July 6, 2010, your Affiant conducted a consensual phone call with a CI to the number 240-604-4630, which is to a cell phone being used at 318 E. Dover St. Easton MD 21601. An unknown male answered the phone call and when asked, informed the CI that there was a 17 year old Honduran girl available. The unknown male explained that she was new and very good. Based on this information, and the fact that a juvenile might be involved, a search and seizure warrant was obtained by Detective M. Orellana. On July 7, 2010, Easton Police Department, Annapolis Police Department and U.S. Immigration and Customs Enforcement conducted a search and seizure warrant at 318 E. Dover St, Easton, MD 21601 Wilber Alejandro

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HERRERA Aranda, Isidro JIMENEZ Sanchez, and Wendi REYES Garcia, were located in the apartment. Search of the home revealed several pieces of evidence, including condoms, paper towels, and lubricants, to support the conclusion that the apartment and individuals were involved in prostitution and trafficking for commercial sex purposes. The occupants of the apartment were arrested and charged with general prostitution and human prostitution trafficking violations. A witness testified under oath that German VENTURA was the person in charge of the prostitution business in the apartment located at 318E Dover St Easton, MD 21601. The witness further stated that WILBERT and ISIDRO operated the brothel at VENTURA's direction and worked for him.

72. On Monday, July 12, 2010, Detective Hartlove observed VENTURA drive the green Ford Explorer, with new MD tags 7MD8666. The vehicle was in the vicinity of Langley Park, MD, and was occupied by VENTURA only. Surveillance was lost for a short time and when the vehicle was reacquired a Hispanic female was in the front passenger seat. While conducting surveillance, your Affiant conducted a consensually monitored three way phone call between a cooperating witness and VENTURA. Your Affiant overheard VENTURA answer his cell phone and have two short conversations with the cooperating witness. The phone number VENTURA answered was 301-418-3124. ICE agents observed the Explorer, occupied by a Hispanic male and Hispanic female, pull into 67 Decatur St, Portsmouth, VA. Later VENTURA was seen in the Explorer going to a local Chinese Restaurant and purchasing a large amount of food and then going to and attempting to purchase paper towels at Ollie's Big Lots.

73 On Monday, August 2, 2010, at 11:19am, Detective Hartlove observed VENTURA and a Hispanic female in a blue shirt and black pants walking from the home of 2936 Powder Mill Rd, Hyattsville MD, to the silver Ford Expedition, MD tag 24979CD, which was parked out front. VENTURA drove and the Hispanic female sat in the front passenger seat.

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At 11:32am VENTURA drove to 1500blk of University Blvd, Hyattsville, MD to a Western Union Cash Depot business. Both VENTURA and the Hispanic female got out of the vehicle. VENTURA walked down the parking lot to an unidentified male sitting in the driver seat of a white Nissan 4 door, with MD tag 5BYL43. The driver's door was open and VENTURA appeared to have been talking with the occupant of the driver's seat. The Hispanic female walked inside the Western Union Cash Depot business. A short time later the female came out of the store and returned to the Expedition with Ventura; both departed the area. Surveillance was terminated at this time and reinitiated at the McDonald's at the corner of Kenilworth Avenue and Riverdale Road, Riverdale, MD. Your Affiant observed VENTURA in the McDonalds' parking lot with the above identified white Nissan Sentra, MD tags 5BYL43. The Hispanic female in the blue shirt was observed getting into the white Nissan. The driver of the Nissan was a Hispanic male with Asian features. Another Hispanic female was in the front passenger seat. The white Nissan left the McDonalds' parking lot and again surveillance was temporarily suspended.

74. At 1:45 p.m., VENTURA was seen arriving back at 2936 Powder Mill Rd. Hyattsville, MD, in the silver Expedition. A gold color Toyota Highland, Florida tag 088IUR, appeared to be following VENTURA and as VENTURA pulled straight in the driveway, the gold Toyota parked on the grass area in front of the fence at 2936 Powder Mill Road. A Hispanic female with a pink shirt and blue jeans exited the gold Toyota with a bag and handed it over to VENTURA as he opened up the trunk to the Ford Expedition. She then entered the Expedition with VENTURA. At 3:00pm VENTURA then drove to his home of 1913 Nova Ave. Capital Heights, MD with the Hispanic female in the front passenger seat. Your Affiant observed

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VENTURA and the Hispanic female leave a short time later in the silver Ford Expedition going out on Ellis St, then Southern Ave to Pennsylvania Ave and onto Route 295 northbound.

Although physical surveillance was terminated, electronic surveillance on the mobile phone showed VENTURA headed southbound on Route 95 to Portsmouth, VA.

75. On August 2, 2010, ICE Agents assigned to Norfolk, VA, observed the following:

- At approximately 1906 hours, a grey Nissan Sentra bearing Virginia 30 day temporary tags arrived at the residence and pulled far into the driveway towards the back of the house;

- At approximately 1933 hours, a Silver Ford Expedition was observed traveling down Decatur St. and pulling into the driveway at 67 Decatur St., Portsmouth, VA. A Hispanic male and a Hispanic female wearing a pink shirt and blue jeans were seen getting out of the vehicle;

76. On August 3, 2010, a cooperating witness in the investigation received three threatening multi-media messages that were sent to the witness' cell phone from the number 301-418-3124, a cell phone associated with VENTURA. A court ordered GPS tracker on the phone indicated the phone was at 1913 Nova Avenue, Capitol Heights, MD, when the threatening messages were sent. The messages depicted the Angel of Death, a semi automatic pistol, the magazine for the pistol and a book. Two of the messages contained a threat composed in Spanish threatening physical violence.

77. On August 4, 2010, ICE SA Joseph of Norfolk, VA, debriefed another reliable ICE Confidential Informant regarding recently received information regarding prostitution in Portsmouth, VA. That CI provided the following information:

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- The CI and a companion met an unidentified Hispanic male at a business near

the alleged brothel. The unidentified male arrived in a Nissan Sentra bearing Virginia 30 day temporary tags and instructed the CI and his companion to follow him. The CI stated that the Nissan traveled to Decatur St. in Portsmouth, VA and pulled into the driveway of a white house. The CI stated he/she could not identify the house number, but that it was the last driveway on the left hand side of Decatur St. facing the intersection of Decatur St. and Channing Ave.

- The CI and the Hispanic male walked towards the back of the residence where the Nissan was parked and conversed with the unidentified Hispanic male who was later identified as Chin LNU. The CI stated that Chin LNU is from Mexico and has a couple distinct scars on his nose; one on the bridge of his nose and another towards his nostril.

- According to the CI, Chin LNU informed him/her that he had a "girl;" he further stated that he had one Brazilian girl at this time and that he highly recommended her. Chin LNU was asked if he delivered the girls, to which he stated that it depends on how many people were interested, if it were just one or two people than it wasn't worth the gas for him to deliver. The CI was informed that Chin LNU's phone number is 757-362-1815.

78. On September 2, 2010, a consensually monitored phone call was placed to 757-759-0710, and an unknown Hispanic male answered the phone. When asked, the person answering stated he had a Chilean female and an Ecuadorian female. The call was conducted in Spanish, and in your Affiant's experience, this type of call is indicative of the operation of a Hispanic brothel.

79. On Monday, September 13, 2010, Annapolis Police Detectives Truitt, Reid, and Hartlove conducted mobile surveillance on German VENTUA from when he left his home at

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1913 Nova Avenue, around 10:38 a.m., until 3:00 p.m. Upon arriving at Nova Ave., Detective Hartlove discovered VENTURA had a new vehicle registered to his business. The vehicle is described as a light blue Honda Civic 4-door, bearing MD tag 9AA0211, which tag is consecutive to the tag on the Nissan Sentra. The tag on the Honda is listed to VVV Construction at 1913 Nova Ave. Capital Heights MD 20743.

80. VENTURA was seen leaving his home at around 10:38 a.m. with a small Hispanic child in the back seat of the vehicle, a tan Nissan MD tag 9AA0212. VENTURA went and picked up a Hispanic female at the McDonald's in Riverdale, MD. A Hispanic female got out of a Green Chevy Conversion Van and got into the front seat of the tan Nissan Sentra with VENTURA. VENTURA then drove toward Annapolis, MD, and pulled up to the mailbox area on Carver St. The Hispanic female got out of the car and went with another unidentified Hispanic male who appeared to be waiting for her. VENTURA quickly got the suitcase out of the trunk, gave it to the unidentified male who carried the bag and escorted the Hispanic female to 31 Carver St., while VENTURA quickly departed. Detective Hartlove followed VENTURA as he drove up to the Baltimore Bus Station off of Route 95 and Route 895, where he picked up another Hispanic female and then headed back to Annapolis, MD. Detectives were unable to determine where the second Hispanic female was discharged. At around 2:45 p.m., VENTURA's tan Nissan Sentra was located in front of 704 Great Bay Ave., Annapolis, MD 21401. A short time later, VENTURA was seen coming out of the front door of the home with the same small Hispanic child who was with him when he left his house at 1913 Nova Ave. that morning. Detective Hartlove observed Luis REYES return to the residence at 704 Great Bay Ave., Annapolis, MD, on a bicycle with a 12-pack of water and a bag of groceries. REYES

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entered the back door of 704 Great Bay Ave. It was determined through electronic surveillance on telephone number 757-575-4168, and physical observation of REYES, that REYES was in possession of the phone associated with this number.

81. On September 19, 2010, at approximately 5:15 p.m., your Affiant and Detective Hartlove conducted surveillance of the Jennifer's Shop at 2134 Forest Drive, Annapolis MD 21401. SA Kelly observed the Silver Ford Expedition MD tag 24979CD parked in front of the Jennifer's Shop. A short time later, Luis "Camillio" REYES operating the tan Nissan Sentra MD tag 9AA0212, was observed entering the parking lot and parking next to the Expedition. REYES exited the Nissan and stood in the open passenger door of the Expedition and engaged in conversation. At approximately 5:25 p.m., VENTURA left in the Expedition alone and drove away from the area, while REYES left in the Nissan alone driving towards Carver Street.

82. On September 19, 2010, at approximately 6:10 p.m., your Affiant observed REYES driving the Nissan with two female Hispanic passengers from the area of Carver Street past the Jennifer's Shop. SA Kelly followed REYES to the BP gas station on Route 2 in Annapolis, MD, and observed REYES fuel the vehicle while the two Hispanic females remained in the Nissan. REYES proceeded to pull out on Route 2, conduct a u-turn, and travel to Route 50 towards Washington D.C. Surveillance was lost at Route 50 and Interstate 95;

83. On Monday, September 20, 2010, your Affiant and Detectives Hartlove and Truitt conducted mobile surveillance at various locations associated with VENTURA's organization. Around 11:00 a.m. Agent Ed Kelly observed Luis REYES pull up in the tan Nissan MD tag 9AA0212, at the McDonald's at Route 201 Kenilworth Ave and Route 410 E West Hwy, Riverdale, MD. One Hispanic female entered the vehicle, rear passenger side. This same female

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was previously observed by your Affiant sitting in the parking lot with a Hispanic male and a carry on bag. REYES drove out of the parking lot and traveled west on Route 410 to the Prince George's Plaza and entered on a side street. Your Affiant next observed REYES driving the tan Nissan in the opposite direction but now it appeared he had an additional Hispanic female passenger.

84. On September 20, 2010, at approximately 12:00 p.m., the tan Nissan was observed in Annapolis, MD by Detective Hartlove at Route 50 and Route 665; the vehicle was occupied by REYES and two Hispanic females. Detective Hartlove maintained surveillance of the tan Nissan to the vicinity of 31 Carver St, Annapolis, MD 21401. Detective Truitt observed REYES drop off the rear passenger, a Hispanic female, to a Hispanic male who was waiting in front of the apartments. The Hispanic male assisted the Hispanic female with her bag. Both then walked up towards building 31 Carver St.

85. Detective Truitt then observed REYES leave in the Nissan with the remaining passenger, a Hispanic female. Detective Hartlove picked up surveillance of the Nissan and observed REYES drive to Anita's grocery store at Fairfax Rd. and Forest Dr., Annapolis. The Hispanic female exited the vehicle and went inside. A short time later the Hispanic female returned to the vehicle. After leaving the grocery store, REYES drove to 704 Great Bay Ave. Annapolis, MD 21401, where both he and the Hispanic female exited the vehicle. Another Hispanic male in a blue shirt came out of the front door and assisted the Hispanic female with her bag. All three then went inside the home. At approximately 12:45 p.m. Detective Hartlove observed REYES exit the home with a phone to his ear. REYES was looking around as if he was waiting and looking for someone to arrive. Within thirty seconds REYES closed the phone

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and turned around and began walking back to the home. Detective Hartlove then observed a Hispanic male in a white and blue stripe shirt follow behind him and enter the front door of the home. The Hispanic male with the white and blue shirt exited the home 15 minutes later and walked towards Forest Dr on Bywater Rd. This activity is consistent with Hispanic brothels operating in Maryland.

86. On Monday, October 4, 2010, at approximately 12:34 p.m., Detective Hartlove observed VENTURA arrive at 704 Great Bay Avenue, Annapolis, MD operating a grey Chev Astrovan. This vehicle was identified as the same van previously herein described as being white with blue stripes. VENTURA and a Hispanic female exited the van and entered 704 Great Bay Avenue. Approximately five minutes later VENTURA came out of the residence, went to the van, retrieved a red bag and another Hispanic female got out of the van and followed VENTURA inside the residence. VENTURA then exited the residence entered the Astrovan and left the area.

87. On Wednesday, October 13, 2010, Prince George's County Police Department received a 911 call from 757-759-0710, alleging a female was being forced into prostitution at 7904 15th Avenue, Hyattsville, MD 20783. Prince George's County Police Department responded but no evidence of forced prostitution was reported at the location.

88. On Thursday, October 14, 2010, a consensually monitored phone call was placed to 757-759-0710, and an unknown Hispanic male answered the phone. When asked, he stated he had two girls, one from Ecuador and one from Mexico. The call was conducted in Spanish, this type of call is indicative of Hispanic brothels.

89. On October 18, 2010, your Affiant observed Luis REYES operating the Nissan, at the McDonald's on Kenilworth Avenue and Riverdale Road. REYES parked the vehicle and

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then proceeded to clean trash out of the vehicle. Your Affiant observed REYES place the trash in the trash receptacle in the McDonald's parking lot. REYES left a short time later and Your Affiant retrieved the trash from the receptacle, Your Affiant maintained constant surveillance of the receptacle and no one had added or removed any trash. In the bag was a receipt showing money had been placed on the account for phone number 443-510-5211. The receipt was for \$75.00 and was from E&D Wireless, 2132 Forest Dr, Annapolis, MD 21401.

90. On October 18, 2010, at 2:53 p.m., Detective Hartlove observed the tan Nissan, MD tags 9AA0212, parked on Oaklawn Avenue near Carver Street Annapolis, MD. Detective Hartlove later observed the tan Nissan at 704 Great Bay Avenue, Annapolis, MD.

91. On October 19, 2010, at approximately 3:10 p.m. Detective Hartlove observed the blue Honda, MD tags 9AA0211, parked in front of 2936 Powder Mill Road, Beltsville, MD. The court ordered GPS on phone number 301-418-3124 indicated the phone was at the residence from 7:10 a.m. to 4:25 p.m. that same day.

92. On October 20, 2010, Detective Hartlove observed the tan Nissan, MD tags 9AA0212, parked on Oaklawn Avenue near Carver Street Annapolis, MD.

93. On October 28, 2010, a consensually monitored phone call was placed to 443-510-5211, an unknown Hispanic male answered the phone and when asked stated he had a Mexican and an Ecuadorian female and they were open until 10:00 p.m. The call was conducted in Spanish, this type of call is indicative of the operation of Hispanic brothels. On November 2, 2010, a consensually monitored phone call was again placed to 443-510-5211, and an unknown Hispanic male answered the phone. When asked, he stated he had one girl from Honduras and one girl coming later. The call was conducted in Spanish and this type of call is indicative of the

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operation of Hispanic brothels. On November 3, 2010, another consensually monitored phone call was placed to 443-510-5211. Again, an unknown Hispanic male answered the phone and when asked stated the one house was closed but the other was open and that he had a Honduran female, approximately 26 years of age. The call was conducted in Spanish, this type of call is indicative of Hispanic brothels.

94. On November 3, 2010, a report of an assault was received by Annapolis Police Department; Detective Hartlove responded to the report of assault. The victim of the assault is known to law enforcement as an individual that has and continues to engage in Hispanic prostitution delivery service. The individual had reportedly been threatened by VENTURA previously. The victim had been contacted by a Hispanic male using telephone number 443-510-5211 and was asked to deliver a prostitute to Fairfax Road, Annapolis, MD. At the delivery location, three Hispanic males attempted to assault the victim. One assailant had a pistol grip shotgun. Later the victim and the three individuals were involved in an altercation when the victim was struck in the head with the barrel of the shotgun. The shotgun was recovered on November 5, 2010, by the Annapolis Police Department. The shotgun had been reported stolen in Anne Arundel County on August 6, 2010. The victim of this assault, a cooperating witness, also had the same multi-media message saved in his phone that was received on August 3, 2010 from phone number 301-418-3124 showing the image of the angel of death and a semi automatic pistol between it's wings.

95. The court ordered GPS tracking on the phone number 301-418-3124, associated with VENTURA, indicated that the phone was in the area of Carver St just before and during the assault. Telephone toll records for the number 301-418-3124 showed 143 contacts between

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301-418-3124 and 443-510-5211 between October 29, 2010 and November 5, 2010. Toll record analysis also shows 23 contacts between 301-418-3124 and 443-510-5211 on November 3, 2010.

96. On November 3, 2010 into the early morning of November 4, 2010, the above identified victim of the assault received and placed a series of consensual calls to the number 301-418-3124, the number of record for VENTURA. During these phone calls, an individual known to the victim as VENTURA, threatened the victim with physical violence to include death.

97. On November 5, 2010, a consensually monitored phone call was placed to 443-510-5211. An unknown Hispanic male answered the phone and when asked he stated that a Honduran female was available and that she was good. The call was conducted in Spanish and as noted above, this type of call is indicative of the operation of Hispanic brothels.

98. On November 6, 2010, a GPS tracker on the phone assigned number 301-418-3124 showed that the phone arrived at 2936 Powder Mill, Beltsville, MD at 11:53 p.m.. GPS readings on 15 minute intervals indicated that the phone remained at the residence until 3:40 p.m. on November 7, 2010.

99. On November 7, 2010, your Affiant observed VENTURA'S grey Chevy Astrovan at 7575 Annapolis Road in the parking lot of Eastern Buffet. Your Affiant observed VENTURA exit the restaurant escorting a Hispanic female with blond curly hair. The female entered the passenger side of the van and VENTURA entered the driver's side. At approximately 7:25 p.m., the vehicle was started and turned on its headlights. At around 7:15 p.m., Detective Hartlove observed a dark color 4-door car with a lighter color rear trunk, MD tag A167229, pull up to Carver St near the mailboxes. A Hispanic male and a Hispanic female came from the area of 31

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Carver St., and got into the car. The female had with her a dark color bag or large purse. The vehicle then drove out to the area of Dorsey Ave. At approximately 7:55 p.m., a 4 door Toyota Corolla, identified above, pulled behind the Astrovan in the parking lot of the Eastern Buffet. Three men partially matching the descriptions of the assailants from November 3, 2010, were seen exiting the Corolla and engaging in conversation with VENTURA at the driver's side window. The men were observed placing their hands into the Astrovan. Detective Hartlove observed the tags on the vehicle to be MD registration A167229 and a record checks indicate the vehicle is registered to Omar Reyes Flores of 1981 Dominoe Road, Annapolis, MD 20401. This residence is within ¼ mile of 31 Carver Street, Annapolis MD. At approximately 7:55 p.m. the Toyota left the restaurant as did the Astrovan. At approximately 8:14 p.m., Detective Hartlove saw the Grey Astrovan stop in front of 2936 Powder Mill Road, Beltsville, MD. Detective Hartlove observed the Astrovan leave a short time later. Your Affiant observed the female walk through the carport of 2936 Powder Mill Road, Beltsville, MD and walk around the back of the house behind a privacy fence. Lights on the exterior of the residence appeared to be motion activated as they were activated when the female walked through he carport and then to the rear of the residence. At approximately 9:26 p.m., ICE SA Hyman and Detective Hartlove observed the Astrovan on Oaklawn Avenue parked next to 33 Carver St. the apartments. Your Affiant observed the Toyota leaving the parking lot of 31 Carver Street at 9:50 p.m. At approximately 10:00 p.m. Detective Hartlove and SA Hyman observed VENTURA leaving from the apartment complex and enter the Astrovan, then leave the area. Detective Hartlove later observed VENTURA at the Dover Downs Casino in Delaware at 11:30 p.m.

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100. On November 8, 2010, at 10:45 a.m., Detective Hartlove observed a green Toyota, MD tag A167229, pick up a Hispanic male in a black jacket and red short as he emerged from between the buildings near 31 Carver Street; the vehicle was operated by a Hispanic male. The Toyota returned at 11:17 a.m. then left again. At approximately 12:00 p.m. the Toyota was observed by ICE SA McKinney at the McDonald's restaurant at Kenilworth Avenue and Riverdale Road in Riverdale, MD. The vehicle was occupied by two Hispanic males and made contact with another Hispanic male who was escorting two Hispanic females. The two Hispanic females and their personal belongings were transferred to the Toyota. Detective Hartlove observed the Toyota returning to the parking lot of 31 Carver Street and the two females exited with their personal belonging. The male passenger also exited and carried the females' belongings in the direction of 31 Carver Street with the females following.

101. On November 8, 2010, your Affiant attempted a consensually monitored phone call to 443-510-5211 and discovered the number had been disconnected. On November 9, 2010, Detective Hartlove working with members of the Annapolis Police Department contacted Verizon and discovered the phone number had been disconnected on November 5, 2010, and changed to 443-510-2387.

102. As Detective Hartlove and other law enforcement officers have talked with witnesses and prostitutes who have worked for VENTURA, many of them have informed Law Enforcement that the doormen at the brothel houses and German VENTURA himself often mention that they are in possession of guns when running the brothels. Some have reported seeing German VENTURA with a handgun on his person or inside the vehicles in which he travels.

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VIII. CONCLUSION

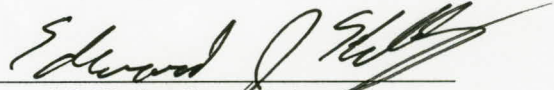
103. Based upon education, training and experience, your Affiant and the other officers assisting with this investigation recognized the actions of German VENTURA, and his associates Kerlin Esau ESQUIVEL-Fuentes, Luis Alberto REYES, Isidro JIMENEZ-Sanchez; and Wibert Alejandro HERRERA-Aranda as the operation of Hispanic brothels and related prostitution activities, including the illegal transportation of individuals in interstate commerce with intent that said individuals engage in prostitution, in violation of 18 U.S.C. § 2421. Your Affiant has probable cause to believe that 31 B Carver St. Annapolis, MD 21401, remains an active brothel where prostitution is occurring and where it is reasonable to believe that evidence, instrumentalities and fruits of these crimes, as indicated in Attachment B hereto, will be discovered. Your Affiant also asserts that it is reasonable to believe that evidence, fruits and instrumentalities, as indicated in Attachment B hereto, of these crimes will be found at VENTURA's home of record at 1913 Nova Avenue, Capitol Heights, MD 20743, as well as at 2936 Powder Mill Rd, Hyattsville, MD 20783, the residence of his girlfriend and the location from which he has frequently been seen arriving and departing before or after engaging in his prostitution operations. Evidence relating to the 2008 murder and other threats and assaults against competitor pimps will constitute evidence of VENTURA's continuing engagement in interstate prostitution activities. Finally, each of the above identified vehicles for which search warrants are sought have been observed in use during the operation of VENTURA's prostitution enterprise and it is reasonable to conclude that evidence, fruits, and instrumentalities of these crimes will be discovered in the vehicles, as indicated in Attachment B hereto.

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ACCORDINGLY, your Affiant respectfully requests this court authorize the warrants this affidavit is submitted in support of as well as authorize the Criminal Complaints in support of which it is likewise submitted.



Edward J. Kelly, Special Agent
Immigration and Customs Enforcement

Subscribed and sworn to before me this 15TH day of November, 2010.



BETH P. GESNER
United States Magistrate Judge

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Attachment A
Locations to be Searched

A. Real Property

1. **1913 Nova Avenue, Capitol Heights, MD 20743**, the home of record of German VENTURA.

The premise to search is known at 1913 Nova Avenue Capitol Heights MD 20743. The home is a single family home of brick structure. The outer screen door is made from black metal iron. The inner front door is white in color. The numbers to the house is posted on the left side of the home next to the door with the number of 1913. From the intersection of Ellis St and Nova Ave, you proceeded to the dead end of Nova Ave and the target house is the five houses down on the right side, from the intersection of Ellis St and Nova Ave. Your Affiant is familiar with the home and can identify it on sight.

2. **31 B Carver St. Annapolis, Anne Arundel Co., Maryland 21401**

The premise to search is known as 31 B Carver St Annapolis, MD 21401. The apartment building is yellow in color with the number 31 printed above the main entrance way of the building. Once you enter the building there are two apartments at the bottom steps. Apartment B is on the right. To the left is Apartment A. There are a total of 6 apartments inside this building. The door color is white and in the center is a black letter B.

3. **2936 Powder Mill Rd, Hyattsville, MD 20783 (Basement Apartment ONLY).**

The home is listed through Department of Assessments and Taxation to Josefina D Mazariego. The basement apartment located in 2936 Powder Mill Road, Hyattsville, MD, and further described as a rancher type house that is brick and white in color. The entrance to the apartment has not been observed by law enforcement due to an 8' privacy fence. The front screen door is white in color that resembles a wrought iron look. A social worker who did a home visit, told Law Enforcement that Esmirna Rebeca DUENAS-Franco, VENTURA's girlfriend, resides in the basement apartment.

B. Vehicles

1. **1995 Green Ford Explorer, Vin# 1FMDU34X7SUA59648**, MD Tag 57157M5, listed to German De Jesus VENTURA of 1913 Nova Ave. Capitol Heights, Prince George County, MD 20743. As of Monday, June 28, 2010 the same vehicle was located at 2936 Powder Mill Rd in Beltsville, MD, with a new tag of **7MD8666**, and now listed to Yenis H Ruiz Vasques, of 1913 Nova Ave. Capitol Heights, MD 20743.

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- 2. 1998 Silver Ford Expedition, Vin# 1FMRU1769WLB80769**, MD Tag 24979CD, listed to Yenis H Ruiz Vasquez of 1913 Nova Ave. Capitol Heights, Prince George County, MD 20743.
- 3. 2000 Chevrolet Astro Van, Vin # 1GCDM19W2YB103763**, MD Tag **A216093**, white with blue stripes down the sides. The 2000 Chev Van is listed to VVV Home Construction Inc, which is a business registered through MD to German VENTURA.
- 4. 1994 Nissan Sentra 4D, Vin # 1N4EB31FXRC773130**, MD Tag 7GCD47, tan in color. The 1994 Nissan was formerly listed to Jose Melvin Bonilla Lago of 318 E Dover St. Easton MD, 21601, and, as of September 10, 2010, the above vehicle switched owners & Tags (**9AA0212**) and is now listed to Jose Antoni Lopez of 8400 Navahoe Dr, Silver Spring, MD 20903;
- 5. 1993 Honda 4door, Vin# 1HGEG8650PL036087**, MD tag **9AA0211**, light blue in color. The 1993 Honda is listed to VVV Construction Inc of 1913 Nova Ave, Capitol Heights, MD 20743;
- 6. 1998 Toyota Corolla, VIN#1NXBR18E4WZ064494**, MD tag A167229, green in color with an off color white trunk. The 1998 Toyota is listed to Omar Reyes Flores of 1981 Dominoe Road, Annapolis, MD 21401.

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Attachment B
Description of Evidence to be Seized

1. Any and all evidence related to the offenses delineated in the affidavit including but not limited to: tally sheets and documents of prostitution, U.S. currency, western union receipts, "angel of death" statues, phone records, phone receipts, receipts, condoms, lubricants, playing cards, chips or markers, business cards, printable homemade business cards, and identification and documents of all occupants of the home, address books, bank statements, tax papers, cellular telephones and information, including but not limited to telephone numbers, names, addresses, email addresses, opened and unopened voicemail messages, text messages, photos or any other electronic data stored in the cellular phones, video equipment, cameras or any electronic equipment involved in prostitution, trace evidence, to include gunshot residue, fibers, fingerprints, also seized would be firearms and ammunition.
2. An oral (buccal swab) DNA specimen from German De Jesus VENTURA's, to be taken by a trained law enforcement officer under sanitary conditions.
3. This warrant authorizes the search of electronically stored information and other documents related to the items listed on Paragraph 1 above.

Because of the possibility that the files examined pursuant to the warrant will include information that is beyond the scope of what the United States has demonstrated the existence probable cause to search for, the search shall be conducted in a manner that will minimize to the greatest extent possible the likelihood that files or other information for which there is not probable cause to search is not viewed.

While this protocol does not prescribe the specific search protocol to be used, it does contain limitations to what government investigators may view during their search, and the searching investigators shall be obligated to document the search methodology used in the event that there is a subsequent challenge to the search that was conducted, pursuant to the following protocol:

With respect to the search of any digitally/electronically stored information that is seized pursuant to this warrant, and described in Attachment A hereto, the search procedure shall include such reasonably available techniques designed to minimize the chance that the government investigators conducting the search will view information that is beyond the scope for which probable cause exists.

The following list of techniques is a non-exclusive list which illustrates the types of search methodology that may avoid an overbroad search, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein:

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- a. Use of computer search methodology to conduct an examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth herein by specific date ranges, names of individuals, or organizations;
- b. Searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth herein;
- c. Physical examination of the storage device, including digitally surveying various file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth herein;
- d. Opening or reading portions of files that are identified as a result of conducting digital search inquiries in order to determine their relevance.